

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 4:20-CR-00269-Y

v.

ERIC KAY

GOVERNMENT’S PROPOSED WITNESS LIST¹

The United States of America (the “government”) hereby submits the following proposed witness list:

Probable Witnesses			
No.	Name / Position	Subject Matter of Testimony	Expert
1	Mohan Aruva Quality Control Analyst KVK-Tech, Inc. (former)	Analysis of pink pills found in T.S.’s room matches commercially approved lot manufactured by KVK-Tech, were not counterfeit, and did not contain fentanyl.	X
2	Cameron Bedrosian Los Angeles Angels Anaheim, California	Interactions with T.S. and interactions with Eric Kay. Will testify that Eric Kay distributed drugs believed to be oxycodone to T.S. and others; and lingo used when referring to oxycodone pills.	

¹ The government filed a witness list on November 1, 2021, consistent with the Court’s scheduling order at that time. (Dkt. 42, 87.) The Court continued the trial and reset the deadline for filing witness lists to February 1, 2022. (Dkt. 79.) At the government’s request, the Court withdrew the government’s previously-filed witness list (Dkt. 104), and the instant filing replaces the previously-filed witness list for purposes of the trial in this matter scheduled to begin on February 8, 2022.

3	Matthew Birch Los Angeles Angels Anaheim, California	Eric Kay's demeanor and performance of work duties before and after the death of T.S.; travel duties for Angels Communications Department staff; Communications Department interaction with players and staff while in California and while traveling with the Angels team.	
4	Jonathan Bishop Forensic Chemist Tarrant County Medical Examiner's Office Fort Worth, Texas	Analysis of blue and pink pills and white powder residue collected from the crime scene.	X
5	Sarah Blum Southlake Police Department 911 Center Southlake, Texas	Custodian of records.	
6	Chris Branham Officer Southlake Police Department Southlake, Texas	Response to 911 call at Hilton Hotel in Southlake, Texas on July 1, 2019.	
7	Kevin Brown Group Supervisor/Task Force Officer Drug Enforcement Administration Tarrant County District Attorney's Office Fort Worth, Texas	Details of the investigation; potential rebuttal; statements of the defendant.	
8	Gary Burleson Assistant General Manager (former) Southlake Hilton	Southlake Hilton hotel payment records and other Hilton hotel records.	

9	Al Castro, or other qualified Angels records custodian Senior Director, Information Technology Angels Baseball, LP Anaheim California	Identification, description, location, and authentication of documents and records of the Los Angeles Angels organization.	
10	Adam Chodzko Los Angeles Angels Anaheim, California	Eric Kay's demeanor and performance of work duties before and after the death of T.S.; Eric Kay's statements about attending rehab for opioid addiction; layout of Angels Stadium and pre- and post-game procedures for communications department; travel duties for communications department; actions taken on July 1, 2019 after learning of the death of T.S.; statements made and actions taken by Eric Kay after the death of T.S.	
11	Christina Couke-Garza Tarrant County Medical Examiner's Office Fort Worth, Texas	Chain of custody.	
12	Mark Coulter General Manager Southlake Hilton	Southlake Hilton hotel payment records and other Hilton hotel records.	
13	Christopher Cron Los Angeles Angels (former) Anaheim, California	Interactions with T.S. and interactions with Eric Kay. Will testify that Eric Kay provided drugs believed to be oxycodone to T.S. and others; lingo used when referring to oxycodone pills; and communications with T.S. and Eric Kay about oxycodone.	

14	Matthew Desaracho Special Agent Drug Enforcement Administration Fort Worth, Texas	May testify about witness statements and investigative steps; potential rebuttal.	
15	Angela DeTulleo Senior Forensic Chemist Drug Enforcement Administration South Central Laboratory Dallas, Texas	The lab results of substances found on items in Eric Kay's desk; analysis of pink pills and blue pill found in T.S.'s room.	X
16	Michael Ferry Special Agent (retired) Drug Enforcement Administration Fort Worth, Texas	Investigation of Eric Kay for distribution of controlled substances resulting in death of T.S.; investigative records related to the investigation regarding the death of T.S.; search of Eric Kay's office; potential testimony related to interviews conducted by the DEA and investigative team; and news coverage of investigation.	
17	Dr. Richard Fries Deputy Chief Medical Examiner Tarrant County Medical Examiner's Office Fort Worth, Texas	Review of the autopsy of T.S.; the critical case review procedures before finalizing the T.S. autopsy and the critical case review of the T.S. autopsy.	X
18	Jaso Gaines Tarrant County Medical Examiner's Office (former) Fort Worth, Texas	Details regarding the autopsy of T.S., including taking samples for further testing.	
19	Kaleb Gillian Southlake Fire EMT (former) Southlake, Texas	Response to 911 call at Hilton Hotel in Southlake, Texas and death determination.	

20	Delaney Green Corporal Southlake Police Department Southlake, Texas	Investigation into the death of T.S. on July 1, 2019; interviews with Angels team and staff, including Eric Kay; chain of custody; interviews of family; statement of the defendant and evidence collection and review.	
21	Dr. Stacey Hail, MD, FACMT Emergency Medical Physician Board Certified Medical Toxicologist Parkland Memorial Hospital UT Southwestern Dallas, Texas	Will provide medical toxicology expert testimony that the fentanyl ingested by T.S. was a but-for cause of his death; contents of expert report.	X
22	Ryan Hamill Los Angeles, California	T.S.'s injuries and difficulty managing and playing through pain; contract status; potential rebuttal.	
23	Stefan Hare United States Secret Service Las Colinas, Texas	Performing download and extraction of iPhones, including the iPhone of T.S. and others; and extraction and analysis of: iCloud accounts, cloud storage accounts, cell phones, evidence extracted from phones, and data from internet service providers.	X
24	John Harris Senior Forensic Chemist Tarrant County Medical Examiner's Office Fort Worth, Texas	Review of forensic analysis of white powder residue collected at the crime scene.	X

25	Matthew Harvey Los Angeles Angels (former) Anaheim, California	Interactions with T.S. and interactions with Eric Kay. Will testify that Eric Kay provided drugs believed to be oxycodone to T.S. and others; knowledge of T.S. oxycodone use; lingo used when referring to oxycodone pills; and communications with Eric Kay about oxycodone.	
26	LeAnne Hazard Forensic Toxicologist Tarrant County Medical Examiner's Office Fort Worth, Texas	Analysis of T.S.'s body fluid samples collected during the autopsy, including for the presence of oxymorphone, oxycodone, and fentanyl.	X
27	Andrew Heaney Los Angeles Angels (former) Los Angeles, California	Attempts to contact T.S. on July 1, 2019, background on T.S. and interactions with T.S. and Eric Kay.	
28	Susannah Herkert Senior Director Guidepost Solutions Washington, D.C.	Pharmaceutical diversion and compliance expert will testify regarding oxycodone and fentanyl distribution; methods employed by individuals engaged in the illegal distribution of controlled substances; the monetary value of illegally diverted controlled substances; "tools of the trade" used by individuals involved in the illegal distribution of controlled substances; the manner and methods by which individuals obtain and use controlled substances as well as indicators that an individual may be illegally obtaining and using controlled substances.	X

29	Debbie Hetman Santa Monica, California	Traveling to Texas to see her son's body, providing code to unlock T.S.'s iPhone, communications with T.S., T.S.'s history, and her interactions with SLPD.	
30	Leticia Hidalgo Tarrant County Medical Examiner's Office Fort Worth, Texas	Chain of custody.	
31	Burshuana Hill Tarrant County Medical Examiner's Office Fort Worth, Texas	Chain of custody.	
32	Susan Howe Crime Laboratory Director Tarrant County Medical Examiner Fort Worth, Texas	Review of analysis of examination of Southlake Hilton key cards and Bic pen for latent prints.	X
33	Mike Hutchinson Hotel Manager (former) Southlake Hilton Southlake, Texas	Southlake Hilton key card and room information and related records; hotel layout; payment transaction records; and absence of video cameras.	
34	Logan Jamison Forensic Chemist Drug Enforcement Administration South Central Laboratory Dallas, Texas	Review of lab analysis of substances on items found in Eric Kay's desk.	X
35	Dr. Robert Johnson Toxicologist Tarrant County Medical Examiner's Office Fort Worth, Texas	Analysis of T.S.'s blood, urine, and other fluids and items collected during the autopsy and from the crime scene.	X
36	Charles Knight Head of Security Los Angeles Angels Tennessee	Events of June 30-July 1, 2019, welfare check on T.S., travel and security procedures, contents of room and T.S. personal items; interactions with Eric Kay.	

37	Dr. Marc Krouse Tarrant County Medical Examiner's Office (former) Fort Worth, Texas	Preparation of the autopsy report of T.S. and cause of death included in report.	X
38	Beryl Landry Forensic Toxicologist Tarrant County Medical Examiner's Office Fort Worth, Texas	Performed ELISA toxicology screening and results of the screening.	X
39	Chris Leanos Santa Monica, California	Leanos's whereabouts on June 27-30, 2019, phone records, travel, and interactions with T.S.	
40	Baldomero Leanos Santa Monica, California	Potential rebuttable.	
41	Connie Lewis Senior Forensic Toxicologist Tarrant County Medical Examiner's Office Fort Worth, Texas	Analysis of body fluid samples collected during T.S.'s autopsy, including base toxicology screening.	X
42	Dr. Richard Luceri Cardiologist Ft. Lauderdale, Florida	Will provide expert testimony that a cardiac-initiated event did not play any role in the death of T.S.	X
43	Jonathan Macheca Sergeant Southlake Police Department Southlake, Texas	Investigation into the death of T.S. on July 1, 2019; interviews with Angels team and staff; chain of custody; interviews of family, statements of the defendant and evidence collection; news coverage of investigation; and investigation of Eric Kay for distribution of controlled substances resulting in death of T.S., including investigative records, such as phone, internet, and bank records.	

44	Aria McCall Tarrant County Medical Examiner's Office Fort Worth, Texas	Chain of custody; process and procedures of evidence intake and analysis; policy and procedures relating to case assignment and analyses.	
45	John W. McIlroy Senior Forensic Chemist Drug Enforcement Administration South Central Laboratory Dallas, Texas	Review of lab analysis of substances found on items in Eric Kay's desk.	X
46	Tim Mead Former Head of Public Relations Los Angeles Angels Anaheim, California	Eric Kay's performance of his duties in the communications department; Eric Kay's hospitalization for opioid addiction; communications after the death of T.S.	
47	John Menon KVK-Tech, Inc.	Reviewed analysis of pink pills found in T.S.'s room that found the pills match commercially approved lot manufactured by KVK-Tech, were not counterfeit, and did not contain fentanyl.	X
48	Nina Miles Santa Monica, California	Travel to Texas after the death of T.S.; interactions at SLPD; turning T.S.'s cell phone and password over to law enforcement; potential rebuttal.	
49	Michael Morin Los Angeles Angels (former) Anaheim, California	Interactions with T.S. and interactions with Eric Kay. Will testify that Eric Kay provided drugs believed to be oxycodone to T.S. and others; lingo used when referring to oxycodone pills; and communications with Eric Kay about oxycodone.	

50	Michael Morley Supervisory Forensic Chemist Drug Enforcement Administration South Central Laboratory Dallas, Texas	Review of lab analysis of substances found in Eric Kay's desk.	X
51	Scott Mosley Accucare Mortuary Service (former) Decatur, Texas	Transportation of T.S.'s body to the Tarrant County M.E.'s Office.	
52	Gaylon Music Sergeant Southlake Police Department Southlake, Texas	Response to 911 call at Hilton Hotel in Southlake, Texas on July 1, 2019.	
53	Lisa Garcia Nunez Records Manager Tarrant County Medical Examiner	Custodian of Records: Tarrant County Medical Examiner's report and records with respect to the death of T.S.	X
54	Dan Ogden DOJ Cyber Crime Lab Washington, D.C.	Analysis and extraction of data from cell phone, network, and internet providers.	X
55	Michelle O'Neal Forensic Chemist Tarrant County Medical Examiner's Office Fort Worth, Texas	Review of forensic analysis of blue and pink pills collected from the crime scene.	X
56	Blake Parker Los Angeles Angels (former) Anaheim, California	Interactions with T.S. and interactions with Eric Kay. Will testify that Eric Kay provided drugs believed to be oxycodone to T.S. and others; lingo used when referring to oxycodone pills.	

57	Vishnuvardhana Poliseti KVK-Tech, Inc. (former)	Approved analysis of pink pills found in T.S.'s room that found the pills match commercially approved lot manufactured by KVK-Tech, were not counterfeit, and did not contain fentanyl.	X
58	Garet Ramos Phoenix, Arizona	History and relationship with T.S., traveling to Texas after T.S.'s death, unlocking T.S.'s iPhone, and T.S.'s text messages.	
59	Garrett Richards Los Angeles Angels (former) Anaheim, California	Interactions with T.S. and interactions with Eric Kay. Will testify that Eric Kay asked him for unused oxycodone pills.	
60	Thomas Roberson Detective Southlake Police Department Southlake, Texas	Evidence collection and crime scene investigation of the death of T.S. at the Southlake Hilton Hotel on July 1, 2019.	
61	David Roose Drug Enforcement Agency Computer Lab	Acquisition, extraction, and analysis of data from cell phone, network, and internet providers.	X
62	Jim Saenz Team Staff Los Angeles Angels Anaheim, California	Travel security procedures for the Los Angeles Angels and whether items were removed from room 469 at the Hilton Hotel in Southlake on July 1, 2019.	
63	Rebecca Schoeny Anaheim, California	Layout of Angels Stadium; location of players and staff after games.	
64	Kathryn Scott Forensic Toxicologist Tarrant County Medical Examiner's Office Fort Worth, Texas	Analysis for the presence of ethanol in body fluid samples collected from T.S.'s body.	X

65	Madison Sedlak Tarrant County Medical Examiner's Office (former) Fort Worth, Texas	Transportation and acceptance of T.S.'s body to the Tarrant County M.E.'s Office.	
66	Mark Sedwick Special Agent Federal Bureau of Investigation Dallas, Texas	Collection of phone toll and location records; analysis of phone records and location data to determine locations of phones during time periods relevant to the investigation and prior to the death of T.S.	X
67	Carli Skaggs Santa Monica, California	Layout of Angels Stadium; interaction with T.S. before and after games; interaction with T.S. on June 30 through July 1, 2019; T.S.'s demeanor and relationship with T.S.; traveling to Texas to identify the body of her husband; interactions with Southlake P.D. and unlocking T.S.'s iPhone.	
68	Senora Spencer Evidence Technician Southlake Police Department Southlake, Texas	Chain of custody for evidence collected in the T.S. death investigation.	
69	Tom Taylor Traveling Secretary Los Angeles Angels Anaheim, California	Events of June 30-July 1, 2019; Eric Kay's behavior and demeanor at work; layout of Angels Stadium; and travel and lodging logistics.	
70	Cory Teague EMT Southlake Fire Department Southlake, Texas	Response to 911 call at Hilton Hotel in Southlake, Texas and death determination.	

71	Randy Thomas Captain Southlake Police Department Southlake, Texas	Securing and investigating crime scene regarding the death of T.S. at the Southlake Hilton Hotel on July 1, 2019.	
72	William Walker Senior Latent Print Examiner Tarrant County Medical Examiner's Office Fort Worth, Texas	Examination of Southlake Hilton key cards and Bic pen for latent prints.	X
73	Shirley Welch Accucare Mortuary Service Fort Worth, Texas	Transportation of T.S.'s body to the Tarrant County M.E.'s Office.	
74	Cheryl Wheeler Forensic Toxicologist Tarrant County Medical Examiner's Office Fort Worth, Texas	Reviewed toxicology case folder for T.S.'s autopsy and quality control processes for the lab.	X
75	Devron Williams Supervisory Special Agent Drug Enforcement Administration Fort Worth, Texas	Potential rebuttal; statements of the defendant.	
76	Adriana Wood Death Investigator Tarrant County Medical Examiner Fort Worth, Texas	Processing and photographing of the crime scene at Southlake Hilton Hotel on July 1, 2019.	
77	Weston Wood Officer Southlake Police Department Southlake, Texas	Evidence collection and crime scene investigation of the death of T.S. at the Southlake Hilton Hotel on July 1, 2019.	
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Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

s/ Lindsey Beran

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the defendant in accordance with the Federal Rules of Criminal Procedure on the 3rd day of February, 2022.

s/Lindsey Beran
Lindsey Beran
Assistant United States Attorney